

MODERN SLAVERY POLICY

Slavery and human trafficking remain a hidden blight on our global society. We all have a responsibility to be alert to the risk, however small, in our business and in the wider supply chain. Our employees are alert to the risks and are expected to report their concerns, and management are expected to act upon them.

Qualter Hall are committed to the principles of the Modern Slavery Act 2015 and the abolition of modern slavery and human trafficking.

The Company has a zero-tolerance approach to modern slavery, and we are committed to acting ethically and with integrity in all our business dealings and relationships and to implementing and enforcing effective systems and controls to ensure modern slavery is not taking place. We expect the same high standards from all of our contractors, suppliers and other business partners.

This policy applies to all persons working for us or on our behalf in any capacity, including employees at all levels, directors, officers, agency workers, seconded workers, volunteers, interns, agents, contractors, external consultants, third-party representatives and business partners.

This policy does not form part of any employee's contract of employment and we may amend it at any time.

Our Supply Chains

Our supply chains include the sourcing of products predominantly from UK based suppliers.

Due to the nature of our business, we assess ourselves to have a low risk of modern slavery in our business and supply chains.

Our supply chains are limited and we procure goods and services from a restricted range of UK and overseas suppliers.

Due Diligence Processes for Slavery and Human Trafficking

As part of our initiative to identify and mitigate risk we:-

- Build long-standing relationships with local suppliers and make clear our expectations of business behaviour;
- Have a policy of "knowing our customer" to ensure that we are contracting with appropriate businesses;
- With regards to national or international supply chains, our point contact is preferably with a UK company or branch and we expect these entities to have suitable anti-slavery and human trafficking policies and processes.

Our Effectiveness in Combatting Slavery and Human Trafficking

We use the following key performance indicators (KPIs) to measure how effective we have been to ensure that slavery and human trafficking is not taking place in any part of our business:

- Use of staff monitoring and payroll systems

Compliance with the Policy

You are encouraged to raise concerns about any issue or suspicion of modern slavery in any parts of our business or supply chains of any supplier tier at the earliest possible stage.

If you believe or suspect a breach of this policy has occurred or that it may occur, you must notify your line manager or company Director OR report it in accordance with our Whistleblowing Policy as soon as possible.

If you are unsure about whether a particular act, the treatment of workers more generally, or their working conditions within any tier of our supply chains constitutes any of the various forms of modern slavery, raise it with your line manager or company Director.

If you believe that you have suffered any such treatment, you should inform your line manager immediately. If the matter is not remedied, and you are an employee, you should raise it formally using our Grievance Procedure.